

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 22-</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: January 25, 2022</b>
<b>INDIRA PREDEOUX</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1349 (conspiracy to commit</b>
	<b>:</b>	<b>wire fraud – 1 count)</b>
		<b>Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

**BACKGROUND**

At all times material to this indictment:

1. TransUnion was one of the three primary consumer credit reporting agencies in the United States, which collected and maintained consumer credit information gathered from creditors, debt collection agencies and public records, among others.
2. The information gathered and maintained by TransUnion was analyzed through a formula that generated an overall evaluation of each consumer's credit worthiness, commonly referred to as a credit report.
3. TransUnion sold credit reports and related data to its customers, including banks and credit companies, who used the TransUnion information to make credit approval and pricing decisions for their own prospective and current customers.
4. TransUnion maintained consumer credit history information in a database on computers used in interstate commerce. That database was stored at TransUnion's headquarters in Chicago, Illinois, but could be accessed via computer from other TransUnion offices.

5. TransUnion employed individuals to make additions, deletions and modifications to consumer credit history information in conformity with TransUnion's policies and procedures to ensure the accuracy of the consumer credit history data. Any additions, deletions or modifications to a consumer credit history required documented supporting information.

TransUnion did not authorize its employees to:

- a. delete or alter any accurate or undisputed credit history information; or
- b. access any consumer credit information unless the employees were making authorized changes to consumer credit history

6. TransUnion maintained an office in the Eastern District of Pennsylvania, specifically, in Crum Lynne, Delaware County, Pennsylvania, which received consumers' disputes alleging errors in their credit histories via phone, facsimile and mail, with TransUnion logging and imaging all dispute documents received from the consumers. Employees at this location were tasked with evaluating and investigating disputes and making corrections to consumer credit history, when necessary.

7. Defendant INDIRA PREDEOUX was employed by TransUnion at its dispute resolution office in Crum Lynne, Pennsylvania and had the following access and authorization:

- a. in or about May 2016, defendant PREDEOUX had access to the database containing TransUnion consumer credit history information, but any change defendant PREDEOUX made to a consumer's credit history information first went through a quality control process before that change went into effect; and

- b. in or about September 2016, defendant PREDEOUX received a promotion at TransUnion that allowed her to make changes to a consumer's credit history information without those changes being reviewed and approved by TransUnion's quality control process.

8. Any changes made by defendant INDIRA PREDEOUX to a consumer's credit history information was transmitted via wire to the TransUnion servers located in Chicago, Illinois and then stored in the database on those servers.

9. Co-conspirator Ashante Richardson, charged elsewhere, was the organizer of and registered agent for Perpetual Synergy LLC ("Perpetual Synergy"), a Georgia limited liability corporation.

10. Services offered by Perpetual Synergy to its customers included credit repair for individuals and obtaining cash loans, lines of credit and credit cards for individuals and businesses.

11. Co-conspirator Frank Willis Crosson, charged elsewhere, was a resident of Kernersville, North Carolina and was an associate of co-conspirator Ashante Richardson.

12. From on or about September 2, 2016 to on or about December 6, 2016, co-conspirators Ashante Richardson and Frank Willis Crosson paid defendant INDIRA PREDEOUX approximately \$40,000 via Square Cash electronic transfers to, or cash deposits into, defendant PREDEOUX's PNC checking account ending in 7626, in exchange for defendant PREDEOUX making unauthorized and unsupported alterations to individuals' TransUnion credit histories, which were intended to falsely improve those individuals' apparent credit histories as reported to creditors, financial institutions and other persons and entities that relied upon the TranUnion credit histories and credit scores to make lending decisions concerning those individuals.

13. The computer servers for PNC Bank were located in Virginia, and data for any transaction conducted at a branch of PNC Bank, including a deposit, was transmitted through a Virginia server location.

**THE CONSPIRACY**

14. From on or about August 30, 2016 to on or about December 6, 2016, in the Eastern District of Pennsylvania, and elsewhere, defendant

**INDIRA PREDEOUX**

knowingly and intentionally conspired and agreed, with co-conspirators Ashante Richardson and Frank Willis Crosson, to devise a scheme and artifice to defraud financial institutions and to obtain money by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, co-conspirators Richardson and Crosson directed defendant PREDEOUX, via text messages, to make unauthorized and unsupported alterations to consumers' TransUnion credit histories, and paid defendant PREDEOUX via wire transfers and bank deposits to make those fraudulent alterations, thus transmitting and causing to be transmitted by means of wire, radio and television communication in interstate commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

It was part of the conspiracy that:

15. Co-conspirator Ashante Richardson and co-conspirator Frank Willis Crosson contacted defendant INDIRA PREDEOUX via cellular telephone calls and text messages to direct defendant PREDEOUX to make unauthorized and unsupported alterations to the TransUnion credit histories of more than 80 individuals, including to the credit histories of co-conspirators Richardson and Crosson.

16. Co-conspirator Ashante Richardson and co-conspirator Frank Willis Crosson paid defendant INDIRA PREDEOUX, via Square Cash electronic transfer to, and cash deposits into, defendant PREDEOUX's PNC Bank account ending in 7626 in exchange for defendant PREDEOUX making the unauthorized and unsupported credit history alterations.

17. In return for the payments from co-conspirators Ashante Richardson and Frank Willis Crosson, defendant INDIRA PREDEOUX made the unauthorized and unsupported alterations to consumers' TransUnion credit histories that co-conspirators Richardson and Crosson requested, resulting in an increase in credit scores for a number of those consumers.

18. Shortly after defendant INDIRA PREDEOUX made the credit history alterations as directed by co-conspirators Ashante Richardson and Frank Willis Crosson, many of the individuals whose credit histories had been altered by defendant PREDEOUX obtained new credit cards, lines of credit and/or loans from financial institutions.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, on or about the following dates, in the Eastern District of Pennsylvania, defendant INDIRA PREDEOUX made unauthorized alterations to the TransUnion credit history of individuals, as directed by co-conspirators Ashante Richardson and Frank Willis Crosson, each alteration constituting a separate overt act, and co-conspirators Richardson and Crosson paid defendant PREDEOUX for making the unauthorized alterations by depositing funds into defendant PREDEOUX's PNC Bank account, ending in 7626 via Square Cash wire transfer or cash deposit, each payment constituting a separate overt act:

<b>Overt Act</b>	<b>Date Credit History Alteration was Made by Defendant PREDEOUX</b>	<b>Individual for Whom Defendant PREDEOUX Made Credit History Alterations</b>
1	09.01.16	Frank Willis Crosson
2	09.01.16	K.P.
3	09.01.16	N.T.
4	09.02.16	Ashante Richardson
5	09.02.16	S.C.
6	09.02.16	S.D.
7	09.02.16	L.T.
8	10.14.16	D.P.
9	10.19.16	M.B.
10	10.19.16	P.D.
11	11.01.16	T.B.
12	11.03.16	A.F.
13	11.07.16	E.F.
14	11.11.16	O.C.
15	11.15.16	I.B.
16	11.15.16	A.C.
17	11.15.16	L.C.
18	11.15.16	Frank Willis Crosson
19	11.15.16	Ashante Richardson
20	11.15.16	J.J.
21	11.16.16	R.J.
22	11.16.16	C.C.
23	11.17.16	S.S.
24	11.17.16	S.B.
25	11.17.16	G.G.
26	11.17.16	C.H.,
27	11.17.16	W.W.
28	11.18.16	K.S.
29	11.21.16	E.J.
30	11.21.16	R.S.
31	11.21.16	C.G.
32	11.21.16	M.J.
33	11.21.16	L.W.
34	11.21.16	W.S.
35	11.22.16	A.D.
36	11.22.16	L.T.
37	11.22.16	T.C.
38	11.22.16	S.J.
39	11.22.16	L.S.
40	11.22.16	R.T.
41	11.23.16	S.D.
42	11.23.16	A.M.

<b>Overt Act</b>	<b>Date Credit History Alteration was Made by Defendant PREDEOUX</b>	<b>Individual for Whom Defendant PREDEOUX Made Credit History Alterations</b>
43	11.23.16	C.G.
44	11.27.16	L.S.
45	11.30.16	I.B.
46	11.30.16	S.S.
47	11.30.16	L.W.
48	12.01.16	E.B.
49	12.01.16	S.B.
50	12.01.16	O.G.
51	12.01.16	A.N.
52	12.02.16	N.H.
53	12.02.16	L.C.
54	12.02.16	S.J.
55	12.05.16	A.D.
56	12.05.16	T.F.
57	12.05.16	H.S.

<b>Overt Act</b>	<b>Date Payment was Made to Defendant PREDEOUX</b>	<b>Payor</b>	<b>Method of Payment to Defendant PREDEOUX</b>	<b>Amount of Payment to Defendant PREDEOUX</b>
58	09.01.16	Ashante Richardson	Square Cash wire transfer	\$1,500
59	09.06.16	Ashante Richardson	Square Cash wire transfer	\$600
60	09.07.16	Ashante Richardson	Square Cash wire transfer	\$300
61	09.09.16	Ashante Richardson	Square Cash wire transfer	\$600
62	09.14.16	Ashante Richardson	Square Cash wire transfer	\$900
63	09.15.16	Frank Willis Crosson	Square Cash wire transfer	\$300
64	09.21.16	Frank Willis Crosson	Square Cash wire transfer	\$300
65	09.22.26	Ashante Richardson	Square Cash wire transfer	\$600
66	09.22.26	Frank Willis Crosson	Square Cash wire transfer	\$600
67	10.14.16	Ashante Richardson	Square Cash wire transfer	\$1,800

<b>Overt Act</b>	<b>Date Payment was Made to Defendant PREDEOUX</b>	<b>Payor</b>	<b>Method of Payment to Defendant PREDEOUX</b>	<b>Amount of Payment to Defendant PREDEOUX</b>
68	10.24.16	Ashante Richardson	Square Cash wire transfer	\$300
69	10.26.16	Ashante Richardson	Square Cash wire transfer	\$300
70	10.27.16	Ashante Richardson	Square Cash wire transfer	\$600
71	10.27.16	Frank Willis Crosson	Cash deposit	\$400
72	10.31.16	Ashante Richardson	Square Cash wire transfer	\$300
73	11.01.16	Ashante Richardson	Square Cash wire transfer	\$1,200
74	11.05.16	Ashante Richardson	Square Cash wire transfer	\$1,000
75	11.07.16	Ashante Richardson	Cash deposit	\$1,400
76	11.08.16	Ashante Richardson	Cash deposit	\$1,500
77	11.09.16	Ashante Richardson	Square Cash wire transfer	\$600
78	11.10.16	Ashante Richardson	Square Cash wire transfer	\$300
79	11.12.16	Ashante Richardson	Square Cash wire transfer	\$1,000
80	11.16.16	Ashante Richardson	Cash deposit	\$4,000
81	11.17.16	Frank Willis Crosson	Square Cash wire transfer	\$300
82	11.18.16	Ashante Richardson	Cash deposit	\$4,500
83	11.18.16	Frank Willis Crosson	Square Cash wire transfer	\$600
84	11.21.16	Frank Willis Crosson	Square Cash wire transfer	\$1,100
85	11.22.16	Ashante Richardson	Cash deposit	\$4,000
86	11.22.16	Frank Willis Crosson	Square Cash wire transfer	\$400
87	11.25.16	Ashante Richardson	Square Cash wire transfer	\$1,500
88	12.01.16	Ashante Richardson	Cash deposit	\$2,500



<b>Overt Act</b>	<b>Date Payment was Made to Defendant PREDEOUX</b>	<b>Payor</b>	<b>Method of Payment to Defendant PREDEOUX</b>	<b>Amount of Payment to Defendant PREDEOUX</b>
89	12.06.16	Frank Willis Crosson	Square Cash wire transfer	\$1,000

All in violation of Title 18, United States Code, Section 1349.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1349, set forth in this information, defendant

**INDIRA PREDEOUX**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).



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**JENNIFER ARBITTIER WILLIAMS**  
**United States Attorney**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

v.

**INDIRA PREDEOUX**

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**INFORMATION**

18 U.S.C. § 1349 (conspiracy to commit wire fraud – 1 count)

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A true bill.

\_\_\_\_\_  
Foreman

Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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